



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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SK  
F. #2011R00783

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 16, 2015

By Email and FedEx

Michael Bachrach  
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Suite 501  
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Steve Zissou  
Steve Zissou & Associates  
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Re: United States v. Agron Hasbjrami  
Criminal Docket No. 11-623 (S-1) (JG)

Dear Sirs:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, enclosed please find additional discovery materials, consisting of:

- Archives of jihadist websites, disk Bates-numbered 1121;
- Records obtained from Lufthansa, Bates-numbered 1122-1127;
- Printouts of travel services websites, Bates-numbered 1128-1134; and
- A flyer recovered from the defendant's residence pursuant to a search warrant, Bates-numbered 1135.

In addition, on February 24, 2015, the government provided notice of its intent to call Evan Kohlmann to testify as an expert at trial. Enclosed please find Mr. Kohlmann's curriculum vitae. The government noted that Mr. Kohlmann is expected to testify as to, inter alia, the content of certain websites at the time of the events in the government's case; this is expected to include the websites contained on the disk Bates-numbered 1121.

If you have any questions or requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

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Enclosures

cc: Clerk of Court (JG) (w/o enclosures)